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11 Attorneys for DEFENDANTS:  
12 HUMANITY FOR HORSES and CARLOS RUBIO

8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE EASTERN DISTRICT OF CALIFORNIA**  
10 **SACRAMENTO DIVISION**

11 JERRY FUENTES, an Individual,

) **CASE NO. 2:21-CV-02350-JAM-AC**

12 Plaintiff,

) **STIPULATION AND ORDER RE:**  
13 **FILING OF SECOND AMENDED**  
14 **COMPLAINT AND TIME FOR**  
15 **DEFENDANTS TO FILE RESPONSIVE**  
16 **PLEADING**

17 v.  
18 HUMANITY FOR HORSES, a California  
19 Non-Profit Corporation; CLAUDIO RUBIO,  
20 an Individual, and DOES 1 through 10,  
21 inclusive,

22 Superior Cmplt. Filed: November 5, 2021  
23 Removed: December 17, 2021  
24 Trial Date: November 27, 2023

25 Defendants.

26 **IT IS HEREBY STIPULATED AND AGREED**, by and between Plaintiff JERRY  
27 FUENTES (“Plaintiff”) and Defendants HUMANITY FOR HORSES and CARLOS RUBIO  
28 (“Defendants”), by and through their attorneys of record, and pursuant to Local Rules 137, 143,  
and 144, that Plaintiff be granted leave to file a Second Amended Complaint (“SAC”) and  
Defendants should have twenty-one (21) days to file their responsive pleadings to that amended  
complaint.

29 The responsive pleading deadline was previously extended three times by stipulation, to  
30 allow additional time for service of individual defendant Claudio Rubio (Dkt. 4), after Rubio was  
31 served, so that responsive pleadings for all defendants would be due on the same date and to

1 allow additional time for discussion between the parties regarding further handling of the matter  
2 (Dkt. 6), and so that Plaintiff may file a First Amended Complaint (Dkt. 10).

3 The parties have since met and conferred on issues Defendants intend to raise in a motion  
4 to dismiss, and Plaintiff has indicated an intent to file a SAC to attempt to address those issues.  
5 Plaintiff's proposed SAC is attached hereto as Exhibit A. The parties therefore believe and  
6 respectfully submit that good cause exists to extend the responsive pleading deadline to allow  
7 time for the filing of the further amended complaint and to allow Defendants twenty-one (21)  
8 days to file their responsive pleadings so that further meet and confer efforts can be undertaken,  
9 if necessary.

10  
11 **IT IS SO STIPULATED AND REQUESTED.**

12 Dated: April 19, 2022

JOHNSON SCHACHTER & LEWIS  
A Professional Law Corporation

14 By: /s/ Kellie M. Murphy

15 KELLIE M. MURPHY  
16 MARIA E. MINNEY  
17 Attorneys for Defendant  
18 HUMANITY FOR HORSES

19 Dated: April 19, 2022

WEST COAST EMPLOYMENT LAWYERS,  
APLC

20 By: /s/ Crystal F. Mohsin (as auth. on 4/19/22)

21 NEAMA RAHMANI  
RONALD L. ZAMBRANO  
CRYSTAL F. MOHSIN  
22 Attorneys for Plaintiff  
23 JERRY FUENTES

## ORDER

Pursuant to the stipulation of the parties, and finding good cause, IT IS HEREBY ORDERED that Plaintiff is granted leave to file a further amended complaint and Defendants shall have twenty-one (21) days from the date of such filing to file their responsive pleadings.

IT IS SO ORDERED.

Dated: April 20, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE

# JOHNSON SCHACHTER & LEWIS

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